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February 22, 2022

Via ECF

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Williams, et al v. U.S., et al., No. 17 Civ. 6779 (WHP)

Dear Honorable Judge Abrams:

Our office represents the Plaintiff in the referenced matter. This letter is submitted to apprise the Court of settlement discussions between the parties.

After some conversation, the defendants are unwilling to offer more than a nominal amount to resolve the matter. The amount offered isn't even enough to satisfy plaintiff's expenses. The Court directed the parties to engage in good faith discussion regarding settlement. The nominal offer made by defendants clearly does not fall anywhere within those parameters.

Defendants seem to be supremely confident in the outcome of their summary judgment motion. However, plaintiff believes there is enough evidence to deny them their expected victory. Among that evidence are the documents contained within their investigation regarding the criminal referral to the FBI designated Mr. Grant's death as a homicide and the information that his body demonstrated compression injuries consistent with strangulation. Further, there was no cardiac related condition or event listed within the New York City medical examiner's autopsy reported attributable to his death.

Regardless, the plaintiff respectfully requests the Court direct the parties to hold a settlement mediation with the Magistrate Judge. Defendants do not consent to this request.

Thank you for your time and attention to this matter.


Respectfully submitted,

Andrew C. Laufer

ACL/

Cc: Lucas Issacharoff, Esq. – Via ECF

By separate order, this case has been referred to a magistrate judge for a settlement conference. The case is otherwise stayed pending completion of that conference. SO ORDERED.

  
Hon. Ronnie Abrams  
February 23, 2022